

**Friday
December 17, 2010
12:00 noon – 2:00 p.m.**

**Standard Insurance Center
Auditorium**

900 SW Fifth Avenue
Portland, Oregon

2 MCLE Credits

“The topics covered were excellent and the structure was informative and easy to follow”

“Mr. Bogdanski’s presentation skills and approach hold an audience easily and make CLE a fun experience”

“This was a great class and I plan to attend next year and bring some coworkers”

**Space is limited; register today!
First come, first served.**

Registration form with payment must be received by Monday, December 13 before 5:00 p.m., or an additional fee will apply.

If you need to cancel, you may request the handout, or substitutions are gladly accepted. Refunds will not be issued. If you are a person with a disability, please let OLI know in time to make any necessary accommodations for you.

Questions? Please call OLI at
(503) 768-6580 or (800) 222-8213
or e-mail us at oli@lclark.edu.

4th Annual
**Recent Developments
in Federal Tax Valuation**

featuring Jack Bogdanski

Jack Bogdanski will discuss the more notable events of the past year (and then some) in the fast-moving world of valuation of property for federal tax purposes. Topics will include areas of interest to income tax practitioners and estate and gift tax practitioners alike, among them:

- the Eighth Circuit’s take on transfer restrictions applicable to a family limited partnership interest under the “bona fide business arrangement” standard of Section 2703;
- the Tax Court’s latest pronouncements on the discount for undivided interests in real property;
- the Tax Court’s emerging (and arguably erroneous) method for determining discounts for “built-in” corporate taxes in valuing the stock of C corporations;
- the Fifth Circuit’s reversal of the Tax Court in *Whitehouse Hotel L.P. v. Commissioner*, dealing with valuation of conservation easements, and new Tax Court decisions on the same subject;
- the Tax Court’s second opinion in *Pierre v. Commissioner*, applying the step transaction doctrine to aggregate a simultaneous gift and intrafamily installment sale of FLP interests to the same transferee for purposes of determining the appropriate level of control adjustment for gift tax valuation purposes;
- the Second Circuit’s opinion in *Stewart v. Commissioner*, in which a valuation strategy led to groundbreaking court pronouncements on Section 2036;
- *Ringgold Telephone Co. v. Commissioner*, wherein the Tax Court treated the price of an asset in a sale several months after the valuation date as influential, but not controlling, in its valuation; and
- additional late developments.

Prof. Bogdanski practiced in Portland as a partner at Stoel Rives LLP. He has taught at Lewis & Clark Law School since leaving practice in 1986. He is a five-time winner of Lewis & Clark’s Leo Levenson Award for excellence in law teaching.

A former member of the Commissioner’s Advisory Group of the U.S. Internal Revenue Service, Prof. Bogdanski is the author of the treatise *FEDERAL TAX VALUATION* and the editor-in-chief of the bimonthly journal *Valuation Strategies*. He has written many articles on federal tax law and is currently the Closely Held Business and Valuation columnist for *Estate Planning* magazine.

Name _____ OSB No. or Profession _____

Firm/Organization _____

Street Address _____

Phone _____ Fax _____

E-mail _____

Please return form and payment to:

OLI Registrar
620 SW Main St., Ste. 706
Portland, OR 97205
PH: (503) 768-6580; (800) 222-8213 • FX: (503) 768-6585 • E-mail: oli@lclark.edu

Tuition

- \$60.00 Regular Tuition
- \$15.00 OLI Annual Passholder (Pass No. _____)
- \$10.00 Add to above tuition if *received after Dec. 13, 2010*
- \$50.00 Course book only
- Deduct 50% from product order if you are an OLI Passholder (Pass No. _____)
- \$7.00 Note: Add \$7.00 shipping and handling fee to above product orders.**

Optional Box Lunch

- \$12.00 Add to above tuition. Please choose one:
 - Turkey Ham Vegetarian Chicken Caesar Salad

ENCLOSED IS \$ _____ BY:

- Check payable to Oregon Law Institute (OLI)
- Credit Card: VISA MasterCard

Acct. No. _____ Exp. Date _____